

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DEUTSCHE BANK SECURITIES, INC.,
Plaintiff,

v.

RADO LIMITED PARTNERSHIP,
Defendants.

Case No.: 18-cv-06768 (DLC)

Affidavit of Gustavo Trujillo

I, Gustavo Trujillo, hereby under Oath state as follows:

1. My name is Gustavo Trujillo.
2. I began my business career working with Biscayne Capital in 2006.
3. At the end of 2013 I moved to Buenos Aires, Argentina to work for Vanguardia (a Biscayne Capital related entity with the same ownership structure).
4. Vanguardia was controlled by Fernando Haberer.
5. In 2014 Fernando Haberer along with Roberto Cortes, Juan Carlos Cortes, and Ernesto Weisson created Madison Assets LLC.
6. Madison Assets was essential to Fernando Haberer and the others above because it created a platform for them to make transactions on securities and allowed the true owners to engage Madison Asset LLC into the same relationship Biscayne Capital had with Deutsche Bank.
7. Madison Assets LLC and Biscayne Capital Ltd. had accounts at Deutsche Bank Direct Securities Services.

8. In December 2015, I was asked by Fernando Haberer and his above mentioned associates to sign on as owner of Madison Assets LLC.
9. While on paper I was the owner, I was in truth a non-equity nominee. Fernando Haberer, Roberto Cortes, Juan Carlos Cortes, and Ernesto Weissen being the true owners.
10. Everything I did with Madison Assets LLC required me to get authority from someone else, which was often provided by Fernando Haberer, among others.
11. In my time working with Fernando Haberer, he also worked as a financial advisor to some of his clients.
12. Among those clients was the Romay Family.
13. Fernando Haberer held himself out as the financial advisor of Biscayne Capital who had the power of attorney for the Rado account.
14. As it relates to the Rado account, Fernando Haberer was representing himself as the financial advisor for Biscayne Capital at the same time he was not only one of the equity owners, but also along with others, was in control of Madison Assets LLC.

Sworn to and subscribed before me this 20th day of December, 2018



[Signature]
Notary public, Signature

Florence Millien
Notary Public, Named Printed

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